

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MATTHEW STEIN and JEROME LHOTE,  
  
Plaintiffs,

v.

SKATTEFORVALTNINGEN,  
  
Defendant.

23 Civ. 2508 (NRB)

SKATTEFORVALTNINGEN,  
  
Counterclaim Plaintiff,

v.

MATTHEW STEIN, JEROME LHOTE, and  
LUKE MCGEE,  
  
Counterclaim Defendants.

**JOINDER OF LUKE MCGEE TO REPLY MEMORANDUM OF LAW IN FURTHER  
SUPPORT OF PLAINTIFFS-COUNTERCLAIM DEFENDANTS'  
MOTION TO DISMISS COUNTERCLAIMS**

Counterclaim Defendant, Luke McGee, by and through his undersigned counsel, hereby joins in the Plaintiffs-Counterclaim Defendants' Reply Memorandum of Law (the "Reply") in Further Support of Plaintiffs-Counterclaim Defendants' *Motion to Dismiss Counterclaims* (the "Motion").<sup>1</sup>

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<sup>1</sup> All capitalized terms used and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

**JOINDER**

Mr. McGee agrees with the positions set forth in the Reply and submits that for all of the reasons articulated therein, including, *inter alia*, that SKAT's *sole* remedy for the alleged failure to pay the remainder of the Final Settlement Amount under the Settlement Agreement is to adhere to the procedural requirements under that Agreement and file the Affidavits of Confession of Judgment, rather than to pursue breach of contract claims and associated damages as it has done, SKAT's counterclaims should be dismissed.

Dated: New York, New York  
August 14, 2023

Respectfully submitted,

**AKIN GUMP STRAUSS HAUER & FELD LLP**

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*Attorneys for Counterclaim Defendant  
Luke McGee*

**CERTIFICATE OF SERVICE**

ROBERT H. PEES, pursuant to Title 28, United States Code, Section 1746, declares under the penalty of perjury:

1. I am an attorney licensed to practice law in the State of New York and admitted to practice before this Court. I am a partner in the law firm of Akin Gump Strauss Hauer & Feld LLP and counsel of record for Luke McGee.

2. On August 14, 2023, I caused a true and correct copy of the JOINDER to be served via ECF upon the following attorneys, who are filing users in connection with the above-referenced case:

William R. Maguire, Esq.  
Marc Alan Weinstein, Esq.  
Neil John Oxford, Esq.  
John Thomas McGoey, Esq.  
Dustin Philip Smith, Esq.  
Hughes Hubbard & Reed LLP

Attorneys for Defendant-Counterclaim  
Plaintiff Skatteforvaltningen

Daniel W. Levy  
McKool Smith P.C.

Attorneys for Plaintiffs-Counterclaim Defendants Matthew Stein and  
Jerome Lhote

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 14, 2023, at New York, New York.

/s/ Robert H. Pees  
Robert H. Pees